

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE	*	BKRTCY. NO. 15-10229 ESL
PABLO JOEL CRUZ NARVAEZ	*	CHAPTER 13
DENISE MARIE DELGADO VAZQUEZ	*	
<u>DEBTORS</u>		

**NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN
AND CERTIFICATE OF SERVICE**

TO THE HONORABLE COURT:

COME NOW, **PABLO JOEL CRUZ NARVAEZ and DENISE MARIE DELGADO VAZQUEZ**, debtors in the above captioned case, through the undersigned attorney and very respectfully state and pray as follows:

1.The debtors are hereby submitting an amended Chapter 13 Plan, dated June 30, 2016, herewith and attached to this motion.

2.This amended Plan is filed to increase the proposed Plan base to \$24,600 in order to cure the "insufficiently funded" issue raised by the Chapter 13 Trustee in his report on confirmation docket entry #30, in the above captioned case.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 30th day of June, 2016.

/s/Roberto Figueroa Carrasquillo
USDC #203614
RFIGUEROA CARRASQUILLO LAW OFFICE PSC
ATTORNEY FOR PETITIONERS
PO BOX 186 CAGUAS PR 00726
TEL NO 787-744-7699 FAX 787-746-5294
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United States Bankruptcy Court
District of Puerto Rico, San Juan Division

IN RE:

Case No. 3:15-bk-10229

CRUZ NARVAEZ, PABLO JOEL & DELGADO VELAZQUEZ, DENISE MARIE

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☐ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: _____ <input checked="" type="checkbox"/> AMENDED PLAN DATED: <u>6/30/2016</u> <input type="checkbox"/> PRE <input type="checkbox"/> POST-CONFIRMATION Filed by: <input checked="" type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<p>I. PAYMENT PLAN SCHEDULE</p> <p>\$ <u>250.00</u> x <u>12</u> = \$ <u>3,000.00</u> \$ <u>450.00</u> x <u>48</u> = \$ <u>21,600.00</u> \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____ \$ _____ x _____ = \$ _____</p> <p style="text-align: right;">TOTAL: \$ <u>24,600.00</u></p> <p>Additional Payments: \$ _____ to be paid as a LUMP SUM within _____ with proceeds to come from: <input type="checkbox"/> Sale of Property identified as follows: _____ <input type="checkbox"/> Other: _____</p> <p>Periodic Payments to be made other than, and in addition to the above: \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>24,600.00</u></p> <p>III. ATTORNEY'S FEES (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$ <u>2,736.00</u></p> <p>Signed: <u>/s/ PABLO JOEL CRUZ NARVAEZ</u> Debtor</p> <p><u>/s/ DENISE MARIE DELGADO VELAZQUEZ</u> Joint Debtor</p>	<p>II. DISBURSEMENT SCHEDULE</p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS: <input checked="" type="checkbox"/> Debtor represents no secured claims. <input type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows: 1. <input type="checkbox"/> Trustee pays secured ARREARS: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. <input type="checkbox"/> Trustee pays IN FULL Secured Claims: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL: Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder: _____ 5. <input type="checkbox"/> Other: _____ 6. <input type="checkbox"/> Debtor otherwise maintains regular payments directly to: _____</p> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law. 11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims. 1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____ <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____ Cr. _____ Cr. _____ Cr. _____ # _____ # _____ # _____ \$ _____ \$ _____ \$ _____ 2. Unsecured Claims otherwise receive PRO-RATA disbursements.</p> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) *Scotiabank PR: Car lease arrears (\$2,520) will be paid paid through the Trustee; the Debtor to continue making current direct payments to lease creditor Scotiabank PR 2011 Jeeps Cherokee. * Treasury Department POC #11-1 (\$637.14) for post-petition taxes under 1305 to be paid in full (100%) through the Trustee.</p>

Attorney for Debtor RFigueroa Carrasquillo Law Office PSC

Phone: (787) 744-7699

IN RE CRUZ NARVAEZ, PABLO JOEL & DELGADO VELAZQUEZ, DENISE MARIE Case No. 3:15-bk-10229

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

Continuation Sheet - Page 1 of 1

	Cr	#	\$
Executory Contracts - Assumed:	Scotiabank De Puerto Shendy Velez		

Label Matrix for local noticing
0104-3
Case 15-10229-ESL13
District of Puerto Rico
Old San Juan
Thu Jun 30 09:57:53 AST 2016

US Bankruptcy Court District of P.R.
Jose V Toledo Fed Bldg & US Courthouse
300 Recinto Sur Street, Room 109
San Juan, PR 00901-1964

BANCO SANTANDER PUERTO RICO
DIV QUIEBRAS
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Carr
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Philadelphia, PA 19101-7346

MONEY EXPRESS
CONSUMER SERVICE CENTER
BANKRUPTCY DIVISION (CODE 248)
PO BOX 9146, SAN JUAN PR 00908-0146

Old Navy Visa/Synch
PO Box 960017
Orlando, FL 32896-0017

Scotiabank de Puerto Rico
PO Box 363368
San Juan, PR 00936-3368

Synch/tjx Cos
PO Box 965015
Orlando, FL 32896-5015

Universal Insurance Company
PO Box 71338
San Juan, PR 00936-8438

FIRSTBANK PR
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SAN JUAN, PR 00908-0146

American Express Bank FSB
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PO Box 3001
Malvern PA 19355-0701

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Bankruptcy Department
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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Quantum3 Group LLC as agent for
Sadino Funding LLC
PO Box 788
Kirkland, WA 98083-0788

End of Label Matrix	
Mailable recipients	32
Bypassed recipients	1
Total	33